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Attorney for Angelo Taylor

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

V.

ANGELO TAYLOR,

Defendant.

Case No. 2:18-cr-00321-JAD-NJK

STIPULATION TO CONTINUE

MOTION DEADLINES

(Third Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Paul D. Riddle, Assistant Federal Public Defender, counsel for Angelo Taylor, that the pretrial motion deadline be continued two weeks.

IT IS FURTHER STIPULATED AND AGREED, that the parties herein shall have to and including May 21, 2019, to file any and all pretrial motions and notices of defense.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including June 4, 2019, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including June 11, 2019, to file any and all replies to dispositive motions.

The Stipulation is entered into for the following reasons:

- 1. The government recently superseded the indictment in Mr. Taylor's case. Defense counsel needs additional time to complete investigations and determine whether motions should be filed, and if so, to prepare and file the motions.
 - 2. The defendant is incarcerated and does not object to the continuance.
 - 3. The parties agree to the continuance.
- 4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
- 5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

NICHOLAS A. TRUTANICH

United States Attorney

This is the third stipulation to continue filed herein.

DATED this 8th day of May, 2019.

RENE L. VALLADARES

Federal Public Defender

/s/ Paul D. Riddle	/s/ Allison Reese
By	By
PAUL D. RIDDLE	ALLISON REESE
Assistant Federal Public Defender	Assistant United States Attorney

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:18-cr-321-JAD-NJK

Plaintiff,

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

v.

ANGELO TAYLOR,

Defendant.

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

- 1. The government recently superseded the indictment in Mr. Taylor's case. Defense counsel needs additional time to complete investigations and determine whether motions should be filed, and if so, to prepare and file the motions.
 - 2. The defendant is incarcerated and does not object to the continuance.
 - 3. The parties agree to the continuance.
- 4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
- 5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

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ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including May 21, 2019 to file any and all pretrial motions and notice of defense.

IT IS FURTHER ORDERED that the parties shall have to and including June 4, 2019 to file any and all responses.

IT IS FURTHER ORDERED that the parties shall have to and including June 11, 2019 to file any and all replies.

DATED this 15th day of May, 2019.

UNITED STATES DISTRICT JUDGE